

NICHOLAS M. WIECZOREK  
Nevada Bar No. 6170  
CLARK HILL PLLC  
3800 Howard Hughes Parkway, Suite 500  
Las Vegas, Nevada 89169  
Telephone: (702) 862-8300  
Facsimile: (702) 862-8400  
nwieczorek@clarkhill.com  
Attorneys for Defendant  
TELEFLEX, Inc.

GERALD P. SCHNEEWEIS, CA State Bar No. 101331  
(Admitted Pro Hac Vice)  
CLARK HILL LLP  
One American Plaza, 600  
West Broadway, Suite 500  
San Diego, California 92101  
Telephone: (619) 557-0404  
Facsimile: (619) 557-0460  
gschneeweis@clarkhill.com  
Attorneys for Defendant  
TELEFLEX INCORPORATED

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JUNE POTTER, as Special Administrator for the  
Estate of JORDAN J. Potter, deceased,

Plaintiff,

v.

ARROWHEAD PRODUCTS, individually and as  
successor in interest to Arrowhead Rubber  
Company; CRANE CO.; GENERAL ELECTRIC  
COMPANY; HENKEL CORPORATION as  
successor-in-interest to Loctite Corporation and  
Dexter Hysol; INDUSTRIAL  
MANUFACTURING COMPANY, as successor in  
interest to Arrowhead Products and Arrowhead  
Rubber Company; NORTHROP GRUMMAN  
CORPORATION; PARKER-HANNIFIN  
CORPORATION, individually and as successor-  
in-interest to Cleveland Wheel & Brake and  
Stratoflex Products; TELEFLEX  
INCORPORATED; TITEFLEX COMMERCIAL  
INC.; WYETH HOLDINGS LLC f/k/a Wyeth

Case No.: 2:20-cv-00276-RFB-VCF

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND DEFENDANT'S  
TIME TO RESPOND TO PLAINTIFF'S  
SECOND AMENDED COMPLAINT**

**[FIRST REQUEST]**

1 Holdings Corp. f/k/a American Cyanamid  
2 Corporation; DOES 1 through 10, inclusive; and  
3 ROE CORPORATIONS 1 through 50, inclusive,  
4  
5 Defendants.

6 Representative Plaintiff June Potter (“Plaintiff”) by and through her counsel of record, Maune  
7 Raichle Hartley French & Mudd, LLC and Craig P. Kenney & Associates; and Defendant Teleflex  
8 Incorporated (“Teleflex”) by and through its counsel of record, Clark Hill PLC, hereby stipulate to the  
9 following:

10 In early December, 2021, counsel for Plaintiff Jordan Potter and counsel for Teleflex reached a  
11 confidential settlement of all claims encompassed in the First Amended Complaint filed by then-Plaintiff  
12 Jordan Potter and Teleflex filed a Notice of Settlement with the Court on December 9, 2021. (Dkt 406,).  
13 In mid-January of 2022, the terms of a formal Confidential Release and Settlement Agreement were  
14 agreed upon by respective counsel and the release was sent by Plaintiff’s counsel to Mr. Potter for  
15 signature. However, Mr. Potter passed away on February 26, 2022 before signing the Release. Plaintiff’s  
16 counsel filed an FRCP Rule 25 Notice of Suggestion of Death, and subsequently the Court granted an  
17 unopposed motion to allow Jordan Potter’s mother June Potter to be substituted as a representative  
18 Plaintiff, to assert the claims that Jordan asserted before he died. (Dkt. 446.) Teleflex did not oppose the  
19 motion, but filed a Response setting forth the sequence of events regarding its settlement. (Dkt.466). On  
20 May 26, 2022 the Court granted the motion allowing June Potter to be substituted as Plaintiff, to assert  
21 the claims that Jordan Potter had asserted. (Dkt. 448.) On January 25, 2023, Plaintiff June Potter filed  
22 the Second Amended Complaint as the Substitute Plaintiff, and it was served on Teleflex and several  
23 other Defendants that same day via CM/ECF. (Dkt. 470.) Absent an extension of time, a response  
24 would be due on or before February 8, 2023. On February 2, 2023, Teleflex received the signed  
25 Confidential Settlement Agreement and General Release of All Claims. Once the Agreement is signed,  
26 the settlement will be funded, and a Stipulation for Dismissal will be entered. Teleflex has thus requested  
27 and Plaintiff has agreed pursuant to IA Rule 6-1 of the Local Rules for the United States District Court  
28

1 District of Nevada, to a 45-day extension up through and including March 10, 2023 for Teleflex to file a  
2 response to the Second Amended Complaint.

3 The extension for Defendant Teleflex to respond to the Second Amended Complaint is requested  
4 due to the fact that Teleflex is still awaiting the executed Confidential Release and Settlement Agreement  
5 from Substitute Plaintiff June Potter, and that once this is received, the settlement will be promptly funded  
6 and a stipulation for dismissal filed, and no response to the Second Amended Complaint will be  
7 necessary. Defendant Teleflex and Plaintiff June Potter thus respectfully request that the Court order  
8 upon this Stipulation that Teleflex shall have 45 calendar days in which to respond to the Second  
9 Amended Complaint, during which time the parties expect the settlement to be completed and a dismissal  
10 with prejudice entered as to Teleflex.

11 IT IS SO STIPULATED on this 7th day of February, 2023.

12  
13 **MAUNE RAICHLE HARTLEY FRENCH &  
MUDD LLC**

**CLARK HILL PLLC**


14 By: /s/ Brian Ladenburg  
15 Brian Ladenburg, Esq.  
16 Maune Raichle Hartley French & Mudd LLC  
17 1200 Fifth Avenue, Suite 1400  
18 Seattle, Washington 98101  
19 Phone (253)229-9629  
20 bladenburg@mrhfmlaw.com  
21 Attorneys for Plaintiff

By: /s/ Gerald P. Schneeweis  
Gerald P. Schneeweis,  
CA State Bar No. 101331  
(Admitted Pro Hac Vice)  
CLARK HILL LLP  
One American Plaza, 600  
West Broadway, Suite 500  
San Diego, California 92101  
Telephone: (619) 557-0404  
gschneeweis@clarkhill.com  
Attorneys for Defendant,  
Teleflex, Inc.

~~PROPOSED~~ ORDER

**GOOD CAUSE APPEARING, IT IS HEREBY ORDERED THAT** Defendant Teleflex Inc. shall have 45 calendar days from February 8, 2023, or until March 10, 2023, in which to file a response to the Second Amended Complaint filed herein.

IT IS SO ORDERED.



Cam Ferenbach  
United States Magistrate Judge

DATED 2-14-2023